

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

CASE NO. 20 -CR-188

-v-

HAMID AKHAVAN,

NOTICE OF MOTION

a/k/a "Ray Akhavan",

Defendant.
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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Defendant, Hamid Akhavan, will move this Honorable Court, before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, New York, pursuant to Federal Rule of Criminal Procedure 12(b)(3)(B)(iii) and (v), for an Order compelling the Government to produce the materials described in the motion pursuant to 18 U.S.C. §3500, Federal Rule of Criminal Procedure 16, the Rules of this Honorable Court and this District, and other applicable law.

DATED this 26th day of June, 2020.

June 26, 2020

Respectfully submitted,

ROTHKEN LAW FIRM

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Ira Rothken

Ira Rothken

Jared Smith

3 Hamilton Landing

Suite 280

Novato, CA 94949

Telephone: (415) 92404250

Fax:

Email: ira@techfirm.net

Email: jared@techfirm.net

/s/ William A. Burck

William A. Burck

Derek L. Shaffer

777 6th Street NW 11th floor

Washington, DC 20005

Telephone: (202) 538-8000

Fax: (202) 538-8100

Email: williamburck@quinnemanuel.com

Email: derekshaffer@quinnemanuel.com

Christopher Tayback
Paul J. Slattery
865 S Figueroa Street 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Fax: (213) 443-3100
Email: christayback@quinnemanuel.com
Email: paulslattery@quinnemanuel.com

Sara C. Clark
711 Louisiana St., Ste. 500
Houston, Texas 77002
Telephone: (713) 221-7000
Fax: (713) 221-7100
Email: saraclark@quinnemanuel.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- against -

RUBEN WEIGAND, and
HAMID AKHAVAN, a/k/a "Ray
Akhavan",

Defendants.

No. 20-CR-188 (JSR)

AFFIDAVIT OF CHRISTOPHER
TAYBACK PURSUANT TO S.D.N.Y. L.R.
16.1

I, Christopher Tayback, swear, under penalty of perjury, as follows:

1. I am an attorney for Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Hamid Akhavan in this action. I have personal knowledge of the facts in this declaration, and if called and sworn as a witness, I would competently testify to these facts.

2. Pursuant to S.D.N.Y. L.R. 16.1, I make this affidavit in support of Defendant Akhvana's Motion to Compel Discovery (the "Motion").

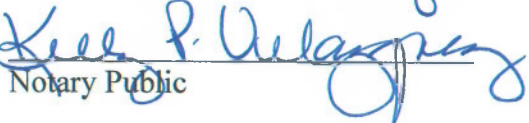
3. Counsel for Defendant Akhavan has conferred with counsel for the Government in an effort in good faith to resolve by agreement the issues raised by the motion without the intervention of the Court and has been unable to reach agreement on the issues raised in the Motion.

Executed on this 25th day of June, 2020.


Christopher Tayback

Subscribed and sworn before me this 25th day of June, 2020.

My commission expires August 23, 2021.


Notary Public

